

1 Jack DiCanio (SBN 138782)
Caroline Van Ness (SBN 281675)
2 SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
3 525 University Avenue
Palo Alto, California 94301
4 Telephone: (650) 470-4500
Facsimile: (650) 470-4570
5 Email: caroline.vanness@skadden.com

6 Steven C. Sunshine (*pro hac vice*)
Julia K. York (*pro hac vice*)
7 SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
8 1440 New York Avenue, N.W.
Washington, DC 20005-2111
9 Telephone: (202) 371-7000
Facsimile: (202) 393-5760
10 Email: steven.sunshine@skadden.com
Email: julia.york@skadden.com

11 *Counsel for Defendant Activision Blizzard, Inc.*
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14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 FEDERAL TRADE COMMISSION,
18 Plaintiff,
19 v.

20 MICROSOFT CORP.,
and
21 ACTIVISION BLIZZARD, INC.

22 Defendants.
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CASE NO. 3:23-cv-02880-JSC

**DECLARATION OF PAGE ROBINSON IN
SUPPORT OF DEFENDANT ACTIVISION
BLIZZARD, INC.'S STATEMENT IN
RESPONSE TO PLAINTIFF FEDERAL
TRADE COMMISSION'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED (Civil L.R. 79-5(f)) [ECF NO. 34]**

Judge: Hon. Jacqueline Scott Corley

1 I, Page Robinson, declare as follows:

2 1. I am a Senior Director of Litigation and Intellectual Property at Activision
3 Blizzard, Inc. (“Activision”). I submit this declaration in support of Activision’s Statement
4 in Response to Plaintiff Federal Trade Commission’s Administrative Motion to Consider
5 Whether Another Party’s Material Should be Sealed. In my role, I have personal
6 knowledge of Activision’s use and protection of non-public, highly sensitive, and
7 confidential business information, including the information at issue here.

8 2. I have personal knowledge of the facts set forth below, and I can and would
9 competently testify to such facts if called to do so.

10 3. I have reviewed and am familiar with the portions of Plaintiff’s Complaint
11 for a Temporary Restraining Order and Preliminary Injunction that Plaintiff filed under
12 seal because it contained information designated by Activision as “Confidential.” Such
13 information is identified in Plaintiff’s Administrative Motion to Consider Whether Another
14 Party’s Material Should be Sealed (ECF No. 34) (the “Administrative Motion”).

15 4. As set forth in the Statement in Response to the Administrative Motion,
16 some of the portions identified in Plaintiff’s Administrative Motion contain non-public and
17 highly sensitive information, including, but not limited to, information reflecting
18 confidential internal business data, revenue figures, assessments of the competitive
19 landscape, internal decision-making processes, business strategy, and strategic evaluation
20 of forward-looking opportunities.

21 5. As further set forth in the Statement in Response to the Administrative
22 Motion, some of the portions identified in Plaintiff’s Administrative Motion contain non-
23 public and highly sensitive information, including, but not limited to, information
24 reflecting business partnerships, as well as the terms of confidential agreements that
25 Activision does not disclose to third parties.

26 6. This information could be used to injure Activision if made publicly
27 available, and it would cause competitive harm to Activision if the above information was
28

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: June 20, 2023

/s/ Caroline Van Ness
Caroline Van Ness